

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JENNIFER BARON,

Plaintiff,

V.

**MIDLAND FUNDING, LLC and
DANIEL SANTUCCI, ESQUIRE**

Defendants.

• • • • •

CASE NO.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendants Midland Funding, LLC and Daniel Santucci, Esquire hereby remove the above-captioned matter to this Court from the Court of Common Pleas of Luzerne County and in support thereof aver as follows:

1. Defendants Midland Funding, LLC and Daniel Santucci, Esquire are defendants in a civil action originally filed on September 17, 2019, in the Court of Commons Pleas of Luzerne County, Pennsylvania, titled *Jennifer Baron v. Midland Funding, LLC & Daniel Santucci, Esquire* and docketed to Case No. 201911486.

2. This removal is timely under 28 U.S.C. § 1446(b). Defendants received service of process by personal service on September 25, 2019.

3. Pursuant to 28 U.S.C. § 1446(b), attached hereto as Exhibit A are copies of all process, pleadings and orders received by Defendant in the state court action.

4. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. §1331, in that Plaintiff filed claims against Defendant alleging violations of the Fair Debt Collections Practices Act, 28 U.S.C. § 1692, *et seq.*

5. On this date, Defendants have provided notice of this Removal to counsel for Plaintiff and the Court of Common Pleas of Luzerne County, Pennsylvania.

WHEREFORE, Defendants respectfully remove this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendants

Dated: October 25, 2019

CERTIFICATE OF SERVICE

I certify that on October 25, 2019, a true copy of the foregoing document
was served as follows:

By Email and U.S. Mail,
Postage prepaid
Carlo Sabatini
Sabatini Freeman, LLC
216 N. Blakely St.
Dunmore, PA 18512
Counsel for Plaintiff

By U.S. Mail, postage prepaid:
Prothonotary
Court of Common Pleas
Luzerne County
200 N. River Street
Wilkes-Barre, PA 18711

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
Lauren M. Burnette, Esquire
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: October 25, 2019